



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

BTR  
F. #2012R01500

610 Federal Plaza  
Central Islip, New York 11722-4454

October 15, 2018

**Via Hand, ECF and FedEx**

David M. Siegal, Esq.  
Mintz, Levin, Cohn, Ferris,  
Glovsky and Popeo, P.C.  
666 Third Avenue  
New York, NY 10017

United States v. John Drago  
Docket No. 18 CR 394(SJF)

Counsel,

This letter provides supplemental discovery pursuant to Rule 16 of the Federal Rules of Criminal Procedure. Please be advised that:

A USB thumbdrive sent with this letter contains electronic copies of the following documents:

DESCRIPTION	BATES NUMBER
KAYLA SEARCH WARRANTY AND INVENTORY	DRAGO-000084 - DRAGO-000116
2/1/2012 MEETING AUDIO	DRAGO-000117
2/1/2012 MEETING AUDIO	DRAGO-000118
2/15/2012 MEETING VIDEO	DRAGO-000119
2/15/2012 PHONECALL AUDIO	DRAGO-000120
2/16/2012 PHONECALL AUDIO	DRAGO-000121
2/16/2012 MEETING AUDIO	DRAGO-000122
2/16/2012 MEETING VIDEO	DRAGO-000123
2/23/2012 PHONECALL AUDIO	DRAGO-000124
7/23/2012 MEETING AUDIO	DRAGO-000125
7/23/2012 MEETING VIDEO	DRAGO-000126
7/23/2012 MEETING VIDEO	DRAGO-000127
7/31/2012 MEETING VIDEO	DRAGO-000128
9/12/2012 MEETING AUDIO	DRAGO-000129
9/25/2012 MEETING AUDIO	DRAGO-000130

2/1/2012 AUDIO FILE	DRAGO-000131
2/8/2012 AUDIO FILE	DRAGO-000132
2/9/2012 AUDIO FILE	DRAGO-000133
2/15/2012 AUDIO FILE	DRAGO-000134
2/16/2012 AUDIO FILE	DRAGO-000135
2/23/2012 AUDIO FILE	DRAGO-000136
7/24/2012 AUDIO FILE	DRAGO-000137
7/31/2012 AUDIO FILE	DRAGO-000138
8/7/2012 AUDIO FILE	DRAGO-000139
8/12/2012 AUDIO FILE	DRAGO-000140
8/30/2012 AUDIO FILE	DRAGO-000141
9/25/2012 AUDIO FILE	DRAGO-000142

This should complete discovery of undercover recordings made by the IRS. Please be advised that a new copy of documents previously produced by defence counsel has been provided in this production. An additional CD of defense supplied records entitled, "Hogwarts," is being duplicated and will be supplied is a subsequent submission as well as duplicates of records supplied by the government during Rule 11 discussions with prior counsel. Arrangements have also been made by the government to scan 9 boxes chosen by defense council with a contracted vendor and is expected to be ready for production in the upcoming weeks.

If you have any further questions, the agents and I are available to meet with you and your client to review the evidence.

Respectfully submitted,

RICHARD P. DONOGHUE  
United States Attorney

By: \_\_\_\_\_/s/  
BURTON T. RYAN, JR.  
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Enclosures

cc: Clerk of the Court (SJF) (w/o enclosures)